

1 | Craig E. Farmer (SBN 61086)
(cfarmer@farmercurtislaw.com)

2 Dawn D. Curtis (SBN 227076)
3 dcurtis@farmercurtislaw.com

FARMER CURTIS, LLP

4 3445 American River Drive, Suite C
5 Sacramento, CA 95864
6 Telephone: (916) 679-6565
Fax: (916) 679-6575

7 | Attorneys for Defendant PAUL BETENBAUGH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO

11 | SAFECO INSURANCE COMPANY OF
12 | AMERICA, a corporation,

13 Plaintiff,

14

VS.

15 PAUL BETENBAUGH, an individual;
DALAS L. GUNDERSEN, an individual.

16 Defendant.

Case No. 2:21-CV-01761-TLN-CKD

STIPULATION AND ORDER MODIFYING THE INITIAL PRETRIAL SCHEDULING ORDER

Action Filed: 09/27/2021

Hon. Judge Troy L. Nunley

20 Pursuant to this Court's September 28, 2021 Initial Pretrial Scheduling Order (ECF No.
21 4), Fed. Rule of Civ. Proc. 16(b)(4), Local Rule 143, and a showing of good cause, the parties
22 in the above action hereby submit the following stipulation and proposed order to modify the
scheduling order.

24 Whereas, the parties in the above action agree that a 90 day extension of the deadlines
25 in this Court's September 28, 2021 Initial Pretrial Scheduling Order (ECF No. 4) is reasonable,
26 necessary, and appropriate to permit completion of appropriate discovery, including any
27 potential motions related thereto, prior to the disclosure of expert witnesses, dispositive
motions and pretrial proceedings.

28 Whereas, the parties have not made any prior requests to modify the scheduling order.

1 IT IS HEREBY STIPULATED by the parties, through their counsel of record, that
2 the current deadlines in the Initial Pretrial Scheduling Order (ECF No. 4) entered by this Court
3 on September 28, 2021 are extended as follows:

4

- 5 ○ All discovery, with the exception of expert discovery, shall be completed no later
6 than December 19, 2022;
- 7 ○ Designation of expert witnesses and reports shall be filed and served no later than
8 February 17, 2023;
- 9 ○ Designation of any supplemental list of expert witnesses who will express an
10 opinion on a subject covered by an expert designated by an adverse party shall be
11 exchanged no later than March 20, 2023; and June 17, 2023.

12 Except as modified, the Court's Initial Scheduling Order (ECF No. 4) remains unchanged.

13 IT IS SO STIPULATED

14 Dated: August 10, 2022

15 FARMER CURTIS, LLP

16 By: /s/ Craig E. Farmer

17 CRAIG E. FARMER

18 DAWN D. CURTIS

19 Attorneys for Defendant PAUL BETENBAUGH

20 Dated: August 10, 2022

21 ROPERS MAJESKI PC

22 By: /s/ Birgit Huber Willand

23 BLAKE J. RUSSUM

24 BIRGIT HUBER WILLAND

25 Attorneys for Plaintiff SAFECO INSURANCE
26 COMPANY OF AMERICA

27 Electronic signature authorized on August 2, 2022

28 ////

1 Dated: August 10, 2022

GARNER & ASSOCIATES, LLP

2

3

By: /s/ John R. Garner
JOHN R. GARNER
PETER C.I. CHEN
Attorneys for Defendant DALAS GUNDERSEN

4

5

6 Electronic signature authorized on August 10, 2022

7

8

9

10

11

12

Farmer Curtis, LLP

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

ORDER

Pursuant to the parties above stipulation and for good cause shown, IT IS HEREBY ORDERED that the Initial Pretrial Scheduling Order (ECF No. 4) is modified as follows:

- All discovery, with the exception of expert discovery, shall be completed no later than December 19, 2022;
- Designation of expert witnesses and reports shall be filed and served no later than February 17, 2023;
- Designation of any supplemental list of expert witnesses who will express an opinion on a subject covered by an expert designated by an adverse party shall be exchanged no later than March 20, 2023; and June 17, 2023.

Except as modified, the Court's Initial Scheduling Order remains unchanged.

IT IS SO ORDERED.

Dated: August 10, 2022

 T. J. Naylor

Troy L. Nunley
United States District Judge